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6 *Attorneys for Alice N. Salas*

FILED  
DISTRICT COURT OF GUAM  
MAY 13 2002  
MARY L. M. MORAN  
CLERK OF COURT

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10 IN THE UNITED STATES DISTRICT COURT  
11 DISTRICT OF GUAM

12 ALICE N. SALAS

13 Plaintiff,

14 vs.

15 JAMES JI ENTERPRISE,  
16 JJ PACIFIC DEVELOPMENT  
17 CORPORATION, JAMES JI,  
18 and HUANG LEE,

19 Defendants.

CIVIL CASE NO. 02-00002

20 SCHEDULING ORDER

21 Pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure, and Local Rule  
22 16.1 for the District Court of Guam, the parties hereby submit the following Scheduling Order:

23 1. The nature of the case is as follows: Plaintiff filed suit against her former employers,  
24 James Ji Enterprises, their affiliates and their agents, under Title 28, United States Code  
25 [hereinafter 28 USC] Section 1875, et seq., alleging that she was unlawfully discharged from her  
26 employment as a result of her federal jury service.

27 2. There are no motions filed or pending in this matter. Discovery has not been initiated  
28 by either party at this time.

3. All motions to add parties and claims shall be filed on or before **May 23, 2002** and

ORIGINAL

1 heard on **June 21, 2002.**

2 4. All motions to amend pleadings shall be filed on or before **May 23, 2002** and heard on  
3 **June 21, 2002.**

4 5. Status of Discovery:

5 a) The times for disclosures under Rules 26(a) and 26(e) of the  
6 Federal Rules of Civil Procedure are modified as follows:

- 7 1. The "Initial Disclosures" described in subsections (A), (B), (C) and  
8 (D) of FRCP Rule 26(a)(1) have not yet been exchanged. [Pursuant  
9 to local rule, these are not to be filed].  
10 2. The "Disclosure of Expert Testimony" as required under FRCP  
11 Rule 26(a) shall be made at least 90 days before the trial date or by  
12 **July 9, 2002.**  
13 3. The "Pretrial Disclosures" described in FRCP Rule 26(a)(3)(A), (B)  
14 and (C) shall be made at least 30 days before the trial date or by  
15 **September 6, 2002.**

16 b) The following is a description and schedule of all pretrial discovery each  
17 party intends to initiate prior to the close of discovery:

18 Plaintiff: Interrogatories; Requests to Produce, Admissions, and depositions  
19 of management, owners, and employees

20 Defendant: Deposition of Plaintiff

21 6. The parties shall appear before the District Court on **May 7, 2002 at 3:15 p.m.** for the  
22 Scheduling Conference.

23 7. The discovery cut-off date (defined as the last day to file responses to discovery) is  
24 **June 17, 2002.**

25 8. The anticipated discovery motions are Motions to Compel from either party. All  
26 discovery motions shall be filed on or before **June 28, 2002** and heard on or **before July 19,**  
27 **2002.** The anticipated dispositive motions are Motions for Summary Judgment by either party.  
28 All dispositive motions shall be filed on or before **July 26, 2002** and heard on or before **August**  
**16, 2002.**

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1 9. The prospects for settlement are unknown at this time.

2 10. The Preliminary Pretrial Conference shall be held on **September 13, 2002 at 3:15**  
3 **p.m.** (no later than twenty-one (21) days prior to trial).

4 11. The parties' pretrial materials, discovery material, witness lists, designations  
5 and exhibit lists shall be filed on or before **September 23, 2002** (no later than fourteen (14) days  
6 prior to trial).

7 12. The Proposed Pretrial Order shall be filed on or before **September 23, 2002** (no later  
8 than fourteen (14) days prior to trial).

9 13. The Final Pretrial Conference shall be held on **September 30, 2002** (seven (7) days  
10 prior to trial).

11 14. The trial shall be held on **October 7, 2002, at 9:00 a.m.** (in no event shall the trial be  
12 later than 18 months after the complaint is filed, unless the Court otherwise allows).

13 15. The trial is not a jury trial.

14 16. It is anticipated that it will take **2 days** to try this case.

15 17. The names of counsel on this case are:

16  
17 For Plaintiff: Sandra D. Lynch  
18 Brooks Lynch & Tydingco LLP  
19 251 Martyr Street, Suite 101  
Agana, Guam 96910  
Telephone: (671) 472-6848

20 For Defendants: Pro Se

21 18. The parties wish to submit this case to a settlement conference.

22 19. The parties suggest that they Stipulate in advance to an interpreter to shorten the trial.

23 20. The following issues will also affect the status or management of the case:

24 At least one of the defendants is an off island resident.


25 Some of the defendants and witnesses are not fluent in English and require

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28 *Civil Case No. CV02-00002*  
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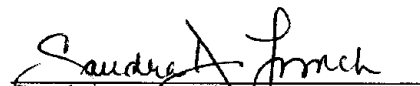
1 interpretation of the spoken and written word.

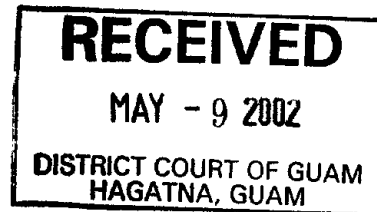
2 DATED this 13<sup>th</sup> day of May, 2002.

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JOHN S. UNPINGCO  
Chief District Judge

Submitted By:

  
Sandra D. Lynch, Esq.  
Brooks Lynch & Tydingco LLP



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1 **CERTIFICATE OF SERVICE**

2 I, KATHRYN W. LITTLEPAGE, Legal Secretary, working in the law firm of **BROOKS**  
3 **LYNCH & TYDINGCO LLP** hereby certify that on or about the 9th day of May, 2002, I  
4 caused to be served by facsimile and hand delivery a copy of the proposed Scheduling Order to:

5 James Ji Enterprises  
6 JJ Pacific Development Corporation  
7 Huang Lee  
8 378 Machaute Street  
Route 8  
Maite, Guam  
(671) 477-2030

9 On the 9<sup>th</sup> day of May, 2002, I also caused to be served a copy of the proposed Scheduling Order  
10 by U.S. Mail to:

11 James Ji  
12 3 Hall Drive  
Orinda, CA 94563-3612

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14 Kathryn W. Littlepage  
15 Legal Secretary  
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